Child Protection and Safeguarding Policy

September 2025

School Name:

Company Number:

Approved By: Board of Trustees

Policy Type: Statutory

Adopted On: September 2025

Date of Next Review: September 2026

Review Period: 1 Year

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Important Contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)		
Other DSLs		
Chair of governors		
Safeguarding governor		
Education People		03456 041 699
NSPCC		08088 005 000
Local authority designated officer (LADO)	LADO team	03000 410 888 kentchildrenslado@kent.gov.uk
Channel helpline		02073 407 264

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents

1. Introduction, aims and ethos

[Name of school] is a community and all those directly connected (staff, volunteers, governors, parents, carers, families and pupils) have an essential role to play in making it safe and secure.

[Name of school] recognises our statutory responsibility to safeguard and promote the welfare of all children.

[Name of school] recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school, children are respected and encouraged to talk openly.

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education (2025)](#) and [Working Together to Safeguard Children (2023)](#), the [Maintained Schools Governance Guide](#) and [Academy Trust Governance Guide](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils.

- [The Human Rights Act 1998, The Equality Act 2010, The Public Sector Equality Duty (PSED).](#)

- [The School Staffing (England) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.

- Part 3 of the schedule to the [Education (Independent School Standards) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.

- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from

issues such as sexual violence; homophobic, biphobic, or transphobic bullying; or racial discrimination.

- Domestic Abuse Act 2021
- Online Safety Act 2023 The Trust recognises the importance of the Online Safety Act 2023, which strengthens protections for children against harmful and illegal online content and places a statutory duty of care on online providers. In line with KCSIE 2025, we are committed to ensuring our safeguarding approach addresses online risks as well as those offline. Further detail on our digital safeguarding measures can be found in the Trust's Online Safety Policy, which should be read alongside this policy.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Providing help and support to meet the needs of children as soon as problems emerge

- Protecting children from maltreatment whether that is within or outside the home, including online

- [Name of school] has a responsibility to play a crucial role in preventative education, and the policies and systems that will underpin this.

- Preventing impairment of children's mental and physical health or development.

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm or cumulative harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children, including the sharing of nude and semi-nudes, and computer-generated imagery.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA).
- Integrated Care Boards for an area within the LA.
- The chief officer of police for a police area in the LA area.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. The Equality Act 2010.

We give special consideration to children who:

- Have special educational needs (SEND) or disabilities (see section 9).

- Are young carers.

- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.

- Have English as an additional language (EAL).

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.

- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.

- Are asylum seekers.

- Are at risk due to either their own or a family member's mental health needs.

- Are looked after or previously looked after (see section 12).

- Have outside agency support.

- Are missing or absent from education for prolonged periods and/or repeat occasions

- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers, and governors in the school. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia, and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy

- Pastoral support system

- Planned programme of relationships, sex, and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:

    o Healthy and respectful relationships

    o Boundaries and consent

    o Stereotyping, prejudice, and equality

    o Body confidence and self-esteem

    o How to recognise an abusive relationship (including coercive and controlling behaviour)

    o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.

    o What constitutes sexual harassment and sexual violence and why they're always unacceptable.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#) 2024, and review this guidance at least annually. Staff will sign to say they have read and understood the document annually.

All staff will be aware of:

- Our systems which support safeguarding (My Concern/CPOMs), including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead, and other DSLs, the behaviour, rewards and exclusions policy, and the safeguarding response to children who go missing from education.

- The early help process and their role in it, including identifying emerging problems, liaising with the DSL and relevant members of the pastoral team, and sharing information with other professionals to support early identification and assessment. Updated factors which may indicate a child may benefit from early help – to include children with health conditions, a mental health need, a family member in prison or affected by parental offending, a risk of honour-based abuse such as FGM or forced marriage, and persistent absence from education (including absences for part of the day).

- Be vigilant as multiple safeguarding issues will overlap with one another.

- Be aware of the risk factors that increase the likelihood of involvement in serious crime.

- The process for making referrals to local authority integrated services and for statutory assessments that may follow a referral, including the role they might be expected to play.

- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM. Reassure

victims that they are being taken seriously and that they will be supported and kept safe. They should not be given the impression they are creating a problem or made to feel ashamed for making a report.

▶ How to maintain an appropriate level of confidentiality while liaising with relevant professionals.

▶ The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE) and child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation. It can include vehicle crime and threatening/committing serious violence.

▶ Be aware that children may become trapped as they or their families may be threatened with violence, and they may be coerced or entrapped into debt or into carrying weapons. They may carry weapons as a form of protection.

▶ Children who are subject to criminal exploitation need to be treated as victims themselves (particularly older children), even though they may commit crimes themselves.

▶ You should be aware that girls are at risk of criminal exploitation too, even though their experience may be different.

▶ Child Criminal Exploitation (CCE) is a form of child sexual abuse, including physical contact and non-contact activities.

▶ Some children may not realise they have been exploited (e.g., they believe they're in a romantic relationship).

▶ Be aware that children are at risk of harm inside and outside their home, at school and online.

▶ Be aware that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.

- Be aware that our schools have a zero-tolerance culture to transphobia and homophobia.

- Be aware of what to look for to identify children who need help or protection.

- Be aware that serious violence (that can be linked to county lines) may relate to the specific safeguarding issues of which staff should be aware.

- Be aware that LGBTQ+ children need a safe space to speak out and share their concerns. The LGBTQ+ trusted adult is <Name>.

- Reinforce the importance of online safety when communicating with parents.

<u>Child on Child Abuse</u>

- Be aware that technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse (as well as face to face).

- Be aware that children can abuse their peers online through:
  - Abusive, harassing, and misogynistic messages.
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups.
  - Sharing of abusive images and pornography, to those who don't want to receive such content.

- Be aware that the Trust IT Technicians are responsible for maintaining systems for Filtering and Monitoring within schools. Ensure all staff are aware that it is their responsibility to report online safety concerns around Filtering and Monitoring to both the Trust IT Helpdesk and their school DSL(s).

- Recognise the indicators of child-on-child abuse, know how to identify it and respond to reports.

- Recognise that child-on-child abuse may be taking place, even if not reported.

- Understand their role in preventing it and responding to it if they believe a child may be at risk.

- Understand the importance of challenging inappropriate behaviours between peers. If they don't, it can create an unsafe environment and lead to a culture that normalises abuse (intimate personal relationships between peers).

- Abuse can take place inside and outside of school or online.

- Staff have a responsibility with regards to anonymity.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our lead DSL is <Name>. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, at least one DSL will be available during school hours for staff to discuss any safeguarding concerns. Outside of school hours, the DSL can be contacted via email.

If a DSL is not available, a member of the leadership team will act as cover.

The DSL will be given the time, funding, training, resources, and support to:

- Provide advice and support to other staff on child welfare and child protection matters.

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.

- Contribute to the assessment of children.

- Refer suspected cases, as appropriate, to the relevant body (local authority integrated services, Channel programme, Disclosure and Barring Service,

and/or police), and support staff who make such referrals directly. If a DSL or member of staff is unsure which appropriate relevant body to refer a suspected case to, please contact the Trust Improvement Officers for Safeguarding:

- o roddanj@aletheiatrust.org.uk **and**

- o armstrongn@aletheiatrust.org.uk).

▶ Have a good understanding of harmful sexual behaviour.

▶ Will be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.

▶ Will discuss the local response to sexual violence and sexual harassment with the police and local authority children's social care colleagues to prepare the school's policies.

▶ Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

▶ The DSL will also keep the headteacher/head of school informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

▶ Be aware of the added online safety responsibilities around Filtering and Monitoring processes.

▶ The Prevent lead is <Name>.

5.3 The governing board

The local governing board will note this policy at each review, ensure it complies with the law and hold the headteacher/head of school to account for its implementation.

The local governing board will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

Section 15.3 of this policy has information on how governors are supported to fulfil their role.

Local Governing boards should facilitate a whole school or college approach to safeguarding. Safeguarding and child protection to be "at the forefront" and underpin all relevant aspects of process and policy development

Local Governing boards should ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some SEND.

Local Governing boards should ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness.

Local Governing boards should review the DfE's filtering and monitoring standards and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards.

Local Governing boards should ensure that the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role.

Local Governing boards should ensure that all staff undergo safeguarding and child protection training including online safety and that such training is regularly updated and is in-line with advice from the safeguarding partners. Make sure that staff understand their expectations, roles and responsibilities, around filtering and monitoring as part of safeguarding training.

5.4 The headteacher/head of school

The headteacher/head of school is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.

- Communicating this policy to parents when their child joins the school and via the school website.

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

- Ensuring the relevant staffing ratios are met, where applicable.

- Making sure each child in the Early Years Foundation Stage is assigned a key person.

- In Early Years Foundation Stage, overseeing the safe use of technology, mobile phones and cameras in the setting (this is also documented in our Photographic & Images Policy).

- It is the responsibility of the headteacher of Early Years Providers to oversee the safe use of technology, mobile phones, and cameras, in the setting.

- Headteachers should make sure the school's policies and procedures, particularly those concerning referrals of cases of suspected abuse and neglect, are understood, and followed by all staff.

- The headteacher will make decisions regarding all low-level concerns, though they may wish to collaborate with the DSL (Lead).

- Ensure online safety training is included in staff safeguarding and child protection training.

6. Confidentiality

<Name> School recognises that all matters relating to child protection are confidential. The headteacher/head of school or DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

DfE Guidance on Information Sharing (July 2018) provides further detail.

All members of staff must be aware that:

- Timely information sharing is essential to effective safeguarding.

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead.

- Staff to be aware that there is no definitive answer if a victim asks the school not to tell anyone about sexual harassment or violence.

7. Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled.
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer.
- Is bereaved.
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime.
- Is frequently missing/goes missing from education, care, or home.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Is at risk of being radicalised or exploited.
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- Are misusing drugs or alcohol.
- Is suffering from mental ill health.
- Has returned home to their family from care.
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage.
- Is a privately fostered child.
- Has a parent or carer in custody or is affected by parental offending.
- Is missing education, or persistently absent from school, or not in receipt of full-time education.

- Has experienced multiple suspensions and is at risk of or has been permanently excluded.

Staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or other DSL trained staff)."

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to integrated services and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or in immediate danger. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Details of how to make a referral can be found in the staff handbook and on the staffroom noticeboard.

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.

- Stay calm and do not show that you are shocked or upset.

- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.

- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.

▶ Write-up and pass on the notes to the DSL via My Concern/CPOMs. If My Concern/CPOMs is unavailable, for any reason, a referral should be made to the DSL in person or via email immediately. Alternatively, if appropriate, make a referral to integrated services and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

▶ Some children may not feel ready to know how to talk about abuse, not recognize their experiences as harmful, or feel embarrassed, humiliated or threatened but that this should not stop staff from having a 'professional curiosity' and speaking to the DSL if they have concerns about a child.

7.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs."

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting,' 'circumcision,' or 'initiation.'

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 should speak to the DSL and following local safeguarding procedures if they suspect a pupil is at risk of FGM or that it has been carried out. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 30 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority integrated services. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority integrated services directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible. The school will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

Early Help

If Early Help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Early Help referrals will be triaged by the Integrated Front Door Team.

The DSL will keep the case under constant review and the school will consider a referral to local authority integrated services if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

All referrals for early help of social services intervention will be made via the Single Request for Support Form on the [Integrated Front Door service](). If it is appropriate to refer the case to local authority integrated services or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving/or the referral has not met threshold, the DSL, or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's integrated services. Make a referral directly, if appropriate (see 'Referral' above). Inform the DSL as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority integrated services team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- ▶ Think someone is in immediate danger

- ▶ Think someone may be planning to travel to join an extremist group

- ▶ See or hear something that may be terrorist-related

7.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree a course of action.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger).
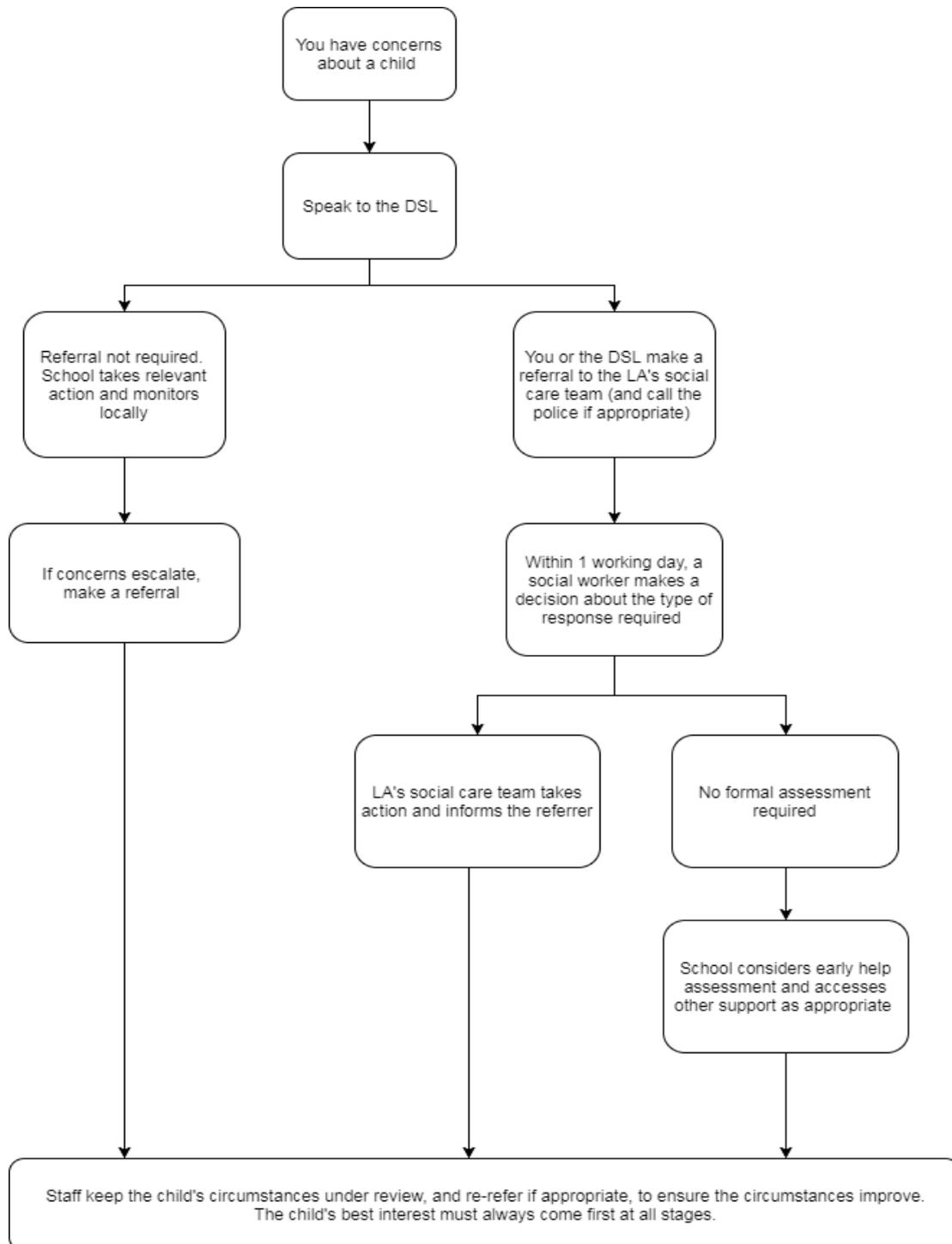
(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)

7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher/head of school. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Early years:

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

If the school receives an allegation about an incident involving an external provider who is not employed by the school, but is hired or using school facilities, then safeguarding policies and procedures will be followed and the LADO will be informed, as per any allegations made against employed school staff.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter," "just having a laugh" or "part of growing up."

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour, rewards, and exclusions policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.

- Is violent.

- Involves pupils being forced to use drugs or alcohol.

- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including sexting).

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it.

- The DSL will contact the local authority integrated services team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys

- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensuring pupils know they can talk to staff confidentially

- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- The school will consider public transport as a potentially vulnerable place for a victim or alleged perpetrator

- The DSL will work closely with the police if there are delays in criminal process

- The school will be alerted to reports of sexual violence/harassment that may point to the environmental/systematic problems or reflect wider issues

- The school will support children who have witnessed sexual violence and that it will do all it can to make sure the victim, alleged perpetrators and any witnesses are not bullied or harassed.

- Information about taking disciplinary action against alleged perpetrators

7.9 Sexting

'Sexting' to refer specifically to the consensual and non-consensual sharing of nude and semi-nude images and/or videos including pseudo-images which are computer-generated images that otherwise appear to be a photograph or video.

Staff responsibilities when responding to an incident.

If staff are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

Staff must not:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.

- Delete the imagery or ask the pupil to delete it.

- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.

- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s).

- If a referral needs to be made to the police and/or integrated services team.

- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed).

- What further information is required to decide on the best response.

- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).

- Whether immediate action should be taken to delete or remove images from devices or online services.

- Any relevant facts about the pupils involved which would influence risk assessment.

- If there is a need to contact another school, college, setting or individual.

- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or integrated services if:

- The incident involves an adult.

- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).

- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent.

- The imagery involves sexual acts and any pupil in the imagery is under 13.

- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the headteacher/head of school and other members of staff as appropriate, may decide to respond to the incident without involving the police or integrated services.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or integrated services, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to integrated services team and/or the police immediately.

Informing parents
The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done by dialling 101 or reporting online.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is.
- How it is most likely to be encountered.
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive.
- Issues of legality.
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images.

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Teaching follows best practice in delivering safe and effective education.

8. Online safety, the use of mobile technology and the use of personal tracking devices

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers, and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, misinformation, disinformation (including fake news), conspiracy theories and extremism.
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing, and/or financial scams

To meet our aims and address the risks above, we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology

- Keeping personal information private

- How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim

Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when pupils are not present.
- Staff will not take pictures or recordings of pupils on their personal phones or cameras.

Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies (where appropriate for the setting/school).

8.1 Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils, and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

[School name] recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

[School name] will treat any use of AI to access harmful content or bully pupils in line with this policy and our [anti-bullying/behaviour] policy.

requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

8.2 Use of Personal Tracking Devices (AirTags and Similar Technology)

In order to safeguard the welfare and privacy of all pupils, the Trust prohibits the use of personal tracking devices, including but not limited to Apple AirTags or similar technologies, on school premises or during Trust-related activities.

While we recognise that parents and carers may wish to use such devices for safety reasons, the presence of location trackers raises significant safeguarding, data protection, and privacy concerns, particularly regarding the potential for unauthorised monitoring and the inadvertent collection of information about other children and staff.

In line with the expectations set out in *Keeping Children Safe in Education (KCSIE)* and our obligations under data protection legislation (UK GDPR and the Data Protection Act 2018), pupils must not bring personal tracking devices onto school premises. Staff who become aware of the use of such a device will notify the Designated Safeguarding Lead (DSL), and appropriate action will be taken to ensure the safety and privacy of all members of the school community.

Parents and carers are asked to work in partnership with the Trust to respect this policy, and to raise any concerns about pupil safety directly with the school so that appropriate safeguarding arrangements can be put in place.

9. Notifying Parents and Carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority integrated services team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

For details relating to online safety, filtering, and monitoring systems, please refer parents to the AAT Online Safety Policy which will be reviewed regularly.

10. Pupils with Special Educational Needs and Disabilities

We recognise that pupils with SEND, or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation, and neglect in this group, including: making the assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

These can include:

- Pupils being more prone to peer group isolation than other pupils.

- The potential for pupils with SEND and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

- Communication barriers and difficulties in overcoming these barriers.

- Information on information sharing and meeting families.

- Raising cognitive awareness for students with

- SEND needs & supporting their emotional health and wellbeing.

- Cognitive understanding.

We offer extra pastoral support for pupils with SEND and disabilities.

11. Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it may inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.

- The provision of pastoral and/or academic support.

- Pupils with SEND are three times more likely to be abused than their peers.

- Abuse involving pupils with SEND will require close liaison with the DSL and the SENCO.

12. Looked-after and Previously Looked-after Children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

> Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

> The DSL and SENCO have details of children's social workers and relevant virtual school heads.

We have appointed a designated teacher, <Name> (SENCO), who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

> Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.

> Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

13. Pupils who are lesbian, gay, bisexual or gender questioning

We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.

We also recognise that LGBTQ+ children are more likely to experience poor mental health than other children. Any concerns should be reported to the DSL. Add details of the pastoral support you offer these pupils, such as appointing an LGBTQ+ pastoral lead.

When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.

When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

For further information please refer to the LGBTQ+ Policy.

14. Complaints and Concerns about School Safeguarding Policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

The school has a Complaints Procedure available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found in the school office, on the school website and staff shared area. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff policy.

14.2 Whistle-blowing

If there is a concern regarding the way the school safeguards pupils, including poor or unsafe practice or potential failures this should be raised immediately.

In the first instance the concern should be raised to the DSL or headteacher/head of school. If the complaint is about the headteacher, the chair of governors should be contacted.

The NSPCC has a whistleblowing adviceline for free and confidential advice: 0800 028 0285.

15. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing. This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely (and ensure receipt of), and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The most recent safeguarding concerns are kept electronically using the My Concern or CPOMS secure systems. Other safeguarding records are kept in a locked cabinet in a locked room. Records are kept strictly confidential. Records are shared with outside agencies as appropriate.

The DSL should send the child protection file to allow the new school/college to have an important place when the child arrives.

In addition:

- ▶ Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.

- ▶ Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of abuse, exploitation, or neglect. This training will be regularly updated and will be in line with national and local guidance.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.

All staff will receive regular online safety training, including an understanding of the expectations, roles, and responsibilities, in relation to filtering and monitoring.

Staff will also receive regular safeguarding and child protection updates (for example, through emails and staff meetings) as required, but at least annually.

Training will be integrated, aligned and considered as part of the whole school/college safeguarding approach.

Training will have regard to the Teachers' Standards, with the expectation that teachers manage behaviour effectively for a safe environment.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

16.2 The DSLs

The DSL and all other DSL trained staff will undertake specific DSL child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

16.3 Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they will receive additional training in managing allegations specifically for this purpose.

Information about what training governors receive and why should be recorded.

16.4 Recruitment – interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

17. Monitoring Arrangement

This policy will be reviewed annually by the Trust and then at school level by the Lead DSL and <mark>Headteacher/Head of School</mark>. At every review, it will be approved by the full governing board and/or board of Trustees.

18. Links with Other Policies

This policy links to the following policies and procedures:

- Behaviour, Rewards and Exclusions.
- Staff Code of Conduct.
- Anti-Bullying
- Complaints.
- Health and Safety.
- Attendance.
- Online Safety.
- Equality.
- Sex and Relationship Education.
- First Aid.
- Curriculum.
- Designated Teacher for Looked-after and Previously Looked-after Children.
- Acceptable Use.
- Photography and Images Policy.
- LGBTQ+ Policy.

19. Appendices

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2025

Appendix One: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse to include an online element which facilitates, threatens and/or encourages physical abuse.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

- Seeing or hearing the ill-treatment of another.

- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual violence to include an online element which facilitates, threatens and/or encourages sexual violence
- 'Upskirting' typically involves taking a picture under a person's clothing without their permission

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).

- Protect a child from physical and emotional harm or danger.

- Ensure adequate supervision (including the use of inadequate caregivers).

- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix Two: Safer Recruitment and DBS Checks – Policy and Procedures

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

When appointing new staff, we will:

- Verify their identity.

- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months.

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.

- Verify their mental and physical fitness to carry out their work responsibilities.

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards where available.

- Verify their professional qualifications, as appropriate.

- Ensure they are not subject to a prohibition order if they are employed to be a teacher.

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent. A letter confirming that they have not imposed and sanctions or restrictions, and/or are aware of any reason why that person may be unsuitable to teach.

- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.

- All shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process.

For primary and Early Years, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or

- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity.

- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

Primary and Early Years: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Primary and Early Years: In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Primary and Early Years:

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors, and members will also have the following checks:

▶ A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities].

▶ Identity.

▶ Right to work in the UK.

▶ Other checks deemed necessary if they have lived or worked outside the UK.

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature

of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

Appendix Three: Allegations of Abuse Made Against Staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

▶ Behaved in a way that has harmed a child, or may have harmed a child, or

▶ Possibly committed a criminal offence against or related to a child, or

▶ Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, or

▶ Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

▶ Consult the local authority (LADO) if any doubt as to whether any concern reaches threshold.

▶ Consult the LADO if an allegation is made against an organisation that is using the school premises but are not employed by the school.

- Safeguarding concerns or allegations from another member of staff to the list of sources through which concerns may rise.

- Using 'sexualizing language' with 'humiliating pupils'.

- Clarify that staff should be able to share low level concerns confidently.

- Indicated that schools should add detail about how the head teacher and DSL lead will work together in their process or procedure for confidently sharing low level concerns.

- The head teacher will be the ultimate decision maker when it comes to low level concerns, but that they may wish to collaborate with DSL.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.

- Providing an assistant to be present when the individual has contact with children

- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.

- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted.

- Temporarily redeploying the individual to another role in a different location, for example to an alternative school.

Definitions for outcomes of allegation investigations

- Substantiated: there is sufficient evidence to prove the allegation.

- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

- False: there is sufficient evidence to disprove the allegation.

- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).

- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher/head of school (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

▶ Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

▶ Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

▶ Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

▶ If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include

information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

Primary and Early Years:
We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the academy trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply staff
If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome.

- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation.

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required.

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.

- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Specific actions
Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated
If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their

services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and integrated services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.

- What, if any, information can be reasonably given to the wider community to reduce speculation.

- How to manage press interest if, and when, it arises.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation.

- Details of how the allegation was followed up and resolved.

- Notes of any action taken, and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

After any cases where the allegations are concluded and substantiated, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.

- The duration of the suspension.

- Whether or not the suspension was justified.

- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 4: specific safeguarding issues

Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's advice for education settings.

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.

Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the

offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:

- Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the child or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the child or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:

- Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first

- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person

Child-on-Child Sexual Violence and Sexual Harassment

All staff need to maintain an attitude of "it could happen here." Addressing inappropriate behaviour can help prevent abusive/violent behaviour. Victims of this abuse will likely find the experience distressing, which can affect their progress in school, this can be made worse if the alleged perpetrator(s) attends the same school. Staff should be aware that girls are more likely to be victims and boys are more likely to be the perpetrators. It could be done by a group, not just an individual, and therefore saying "perpetrator(s)" in this section, rather than "perpetrator"

- Staff don't need to wait for a child to make a disclosure, they should act on any concerns immediately.
- Staff may overhear a conversation that suggest a child may have been harmed or a child's behaviour may be an indicator.
- Staff may confiscate devices for evidence to hand to the police, if the report includes an online element.
- DSL can ask children outright if they've been harmed and what the nature of the harm was.
- Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- Reflect back, using the child's language, when hearing a report.

- Recognise it may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse.

- Child on child abuse can take place face to face, online, and sometimes simultaneously between the two.

- Reinforced that the school has a zero-tolerance approach to sexual violence and sexual harassment, and that even if there are no reports, that does not mean that this kind of abuse is not happening.

- Abuse in intimate personal relationships between children is sometimes known as 'teenage relationship abuse.'

- When considering instances of sexual violent behaviour between children the school, will consider ages and stages of development.

- School recognizes that children displaying harmful sexual behaviour have often experienced abuse and trauma and will offer them appropriate support.

- Domestic abuse can take many forms and DSLs should be aware.

- A victim reporting any form of abuse or neglect should never be given the impression that they are creating a problem by doing so.

- When supporting victims, staff will reassure them that the law on child-on-child abuse is there to protect them, not criminalise them.

- Staff will consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur, and whether revising policies and forward and/or providing extra staff training could minimize the risk of it happening again.

- Staff will remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and shows sensitivity to their needs.

- Visitors to the school who are visiting in a professional capacity will not be asked to show their DBS certificate has already provided pre or written confirmation that the appropriate level of DBS check has been carried out.

Children Absent from Education

A child absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse, exploitation, and neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families.
- Come from the families of service personnel.
- Go missing or run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend a school.
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority integrated services team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's integrated services team and the police, if appropriate.

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- ▶ Having an older boyfriend or girlfriend.
- ▶ Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's integrated services team and the police, if appropriate.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the DSL before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSLs will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to integrated services.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing. It is illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion, are not used.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

▶ A pupil confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out

- A family/pupil already being known to social services in relation to other safeguarding issues

- A girl:

  - Having difficulty walking, sitting or standing, or looking uncomfortable

  - Finding it hard to sit still for long periods of time (where this was not a problem previously)

  - Spending longer than normal in the bathroom or toilet due to difficulties urinating

  - Having frequent urinary, menstrual or stomach problems

  - Avoiding physical exercise or missing PE

  - Being repeatedly absent from school, or absent for a prolonged period

  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour

  - Being reluctant to undergo any medical examinations

  - Asking for help, but not being explicit about the problem

  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)

- FGM being known to be practised in the girl's community or country of origin

- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

- A girl:

- Having a mother, older sibling or cousin who has undergone FGM

- Having limited level of integration within UK society

- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period

- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)

- Being unexpectedly absent from school

- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

▶ Speak to the pupil about the concerns in a secure and private place

▶ Activate the local safeguarding procedures and refer the case to the local authority's designated officer

▶ Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

▶ Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

▶ **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence.

▶ **Extremism** is the promotion or advancement of an ideology based on violence, hatred, or intolerance, which aims to:

   o Negate or destroy the fundamental rights and freedoms of others; or

   o Undermine, overturn, or replace the UK's system of liberal parliamentary democracy and democratic rights; or

   o Intentionally create a permissive environment for others to achieve the results outlined in either of the above points.

▶ **Terrorism** is an action that:

   • Endangers or causes serious violence to a person/people;

   • Causes serious damage to property; or

   • Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from becoming involved with or supporting terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.

- Becoming susceptible to conspiracy theories and feelings of persecution.

- Changes in friendship groups and appearance.

- Rejecting activities they used to enjoy.

- Converting to a new religion.

- Isolating themselves from family and friends.

- Talking as if from a scripted speech.

- An unwillingness or inability to discuss their views.

- A sudden disrespectful attitude towards others.

- Increased levels of anger.

- Increased secretiveness, especially around internet use.

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.

- Accessing extremist material online, including on Facebook or Twitter.

- Possessing extremist literature.

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Checking the identity and suitability of visitors

All visitors will be required to sign in and out at reception. Visitors who are not DBS checked and outside agency staff will be accompanied at all times.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to wear a visitor's sticker and read and understand the safeguarding statement when signing in.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Make contact with emergency contacts in order of priority.

- Where appropriate, contact the integrated services team.

- Keep the child safe until a responsible adult is available.

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Inform the parent/carer immediately.

- Deploy a team of staff to look for the child.

- Inform the emergency services, as appropriate.